

CHAPTER 8. CONDUCTING THE FOLLOW-UP PHASE

8-1 OBJECTIVE. The objective of this Chapter is to provide guidance to Field Offices in conducting the follow-up phase of a review(s).

8-2 CONDUCTING THE FOLLOW-UP PHASE.

A. Follow-up. During the follow-up phase of the review, the Field Office monitors the PHA's success in achieving OIP goals, analyzes any failure to meet targeted goals, and takes appropriate action to help keep the PHA on track. This third and final phase of the review is absolutely critical to ensuring that implementation of the OIP leads to concrete results. Informed and committed monitoring of PHA progress accomplishes two important purposes: (1) demonstrates to PHA and local leadership that HUD is committed to seeing results; and (2) provides a mechanism for the Field Office to take appropriate action if progress towards improvement is stalled.

B. Compare actual to intended performance results/quarterly reporting. The first step in the follow-up process is to assess, at quarterly intervals, whether the PHA is meeting its interim OIP goals. In carrying out this task, the Field Office should work with the PHA staff. Information shall be provided on a quarterly basis to be used by the Field Office in assessing the PHA's performance.

1. Information to be provided quarterly shall include:

- a. Findings;
- b. Baseline data for each finding, where appropriate;
- c. Performance goal;
- d. Target vs. actual performance by quarter; and
- e. Narrative explanation of any performance shortfalls and recommended corrective action(s).

2. Additional sources of information regarding PHA progress include the following:

- a. PHMAP results;

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- b. PHA financial statements and other required HUD reports;
- c. Additional reports compiled by the PHA;
- d. Assessments by other oversight entities; (e.g., IA,

OIG, etc.);

e. Correspondence from residents, local citizens; and

f. Follow-up site-visit.

C. Information requests. Field Offices should not request additional reporting information from PHAs.

D. Evaluate reasons for discrepancies between actual and intended performance results. If the PHA has not met interim OIP goals, the Field Office should determine the reasons for this failure. Such an assessment would include consideration of such factors as:

1. The extent of PHA failure to meet performance goals. A small shortfall may not be a great concern, while a large discrepancy may indicate a more serious problem.

2. Level of PHA and local leadership's commitment to the improvement effort. Based on the review team's interactions with PHA and local leadership, Field Office staff should assess whether failure to meet performance goals indicates an unwillingness to change, or whether the PHA was overwhelmed by other circumstances.

3. Unusual or unexpected circumstances, not anticipated in the original OIP, that may have affected the PHA's ability to meet interim performance goals.

4. Effectiveness of technical assistance efforts, for example:

a. Coordination of services; i.e., the extent to which the work of different providers has been integrated to achieve cross-cutting solutions across functional areas.

b. Targeting and scope of services; i.e., whether PHA staff are receiving services in the right areas and at the right intensity. For example, have PHA staff attended a one-day workshop when more long-term, on-site assistance was needed? Do the services address underlying causes rather than symptoms?

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c. Quality/effectiveness of services.

d. Relationship between technical assistance providers and PHA management/staff; i.e., the extent to which PHA staff work constructively with providers, act on their advice, provide them with necessary information, etc.

5. Appropriateness of original performance goals: Developing an OIP is often a complex exercise, and miscalculations can

occur during this initial planning process. While these goals should not be permitted to slide for frivolous reasons, the Field Office may determine that PHA management has acted in good faith, and that the original goals should be renegotiated.

E. Take action to assure continuing progress towards acceptable PHA performance/reduction in risk assessment score.

1. To maintain the momentum of the improvement process, the Field Office must respond promptly to a PHA's failure to meet interim goals. PHAs that have met interim goals should be duly recognized, even as the Field Office continues to stress the importance of their continuing to strive for even greater improvement. Recognition of PHA achievements in specific areas should present a balanced/realistic perspective on the PHA's overall performance. Recognition for meeting goals must be accompanied by a clear identification of any areas where there is failed performance and further improvements are needed.

2. The nature of the Field Office's response to the PHA that fails to meet performance goals should be determined by the Field Office's assessment of the reasons for that failure. If the shortfall is due to factors beyond the PHA's control, the Field Office should continue working with PHA and local leadership to resolve the problems and move forward with the OIP. However, if failure to meet improvement objectives is rooted in PHA and/or local resistance or lack of capacity, the Field Office should reconsider the viability of the cooperative problem-solving approach and may proceed with those steps outlined in Chapter 7, "Targeted Interventions."

F. Completing the problem-solving cycle. Throughout the follow-up phase, the Field Office should maintain a strong oversight presence and take all necessary action(s), whether technical assistance or targeted intervention, to

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ensure that the PHA achieves its ultimate mission; safe, decent, affordable housing for the PHA's residents. As performance improves, the PHA will require progressively less oversight.

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